

Mr. Vince Cook  
Springs Valley Manufacturing  
8831 West State Road 56  
West Baden Springs, IN 47469-9655

Re: 117-12544-00004  
Significant Permit Modification to  
OP 59-10-90-0051; OP 59-10-90-0052  
OP 59-10-90-0053; OP 59-10-90-0054  
PC (59) 1806; CP 117-9836-00004

Dear Mr. Cooke:

Springs Valley Manufacturing was issued OP 59-10-90-0051 and OP 59-10-90-0052 on March 9, 1987, amended September 3, 1987; OP 59-10-90-0053 and OP 59-10-90-0054 on September 3, 1987; PC (59) 1806 on October 4, 1990, and CP 117-9836-00004 on August 18, 1998, for surface coating operations. A letter requesting changes to these permits was received on July 3, 2000.

The requested revisions have already been through a 30 day public notice period as part of the draft Part 70 permit for the source, T 117-7357-00004. Issuance of the Part 70 permit has been delayed; therefore, the source has requested to have these revisions made separately. A significant modification to these permits is hereby approved as described in the attached Technical Support Document. The modification has been incorporated into the pending Part 70 permit pursuant to 326 IAC 2-7-10.5(l)(3).

The modification consists of changes in the VOC limits for the surface coating operations, from individual limits on groups of coating booths, the dip tank, and the Automated Flat Line Finishing System, to a general surface coating VOC limit, with corresponding record keeping and reporting requirements. This also limits the potential to emit (PTE) of VOC for the source to less than 250 tons per year. Compliance with these conditions makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

All other conditions of the permits shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permits.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vickie Cordell, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Vickie Cordell or extension (3-1782), or dial (317) 233-1782.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments

vkC

cc: File - Orange County  
U.S. EPA, Region V  
Orange County Health Department  
Air Compliance Section Inspector - Ray Schick  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

DRAFT

**PART 70 SIGNIFICANT PERMIT MODIFICATION  
OFFICE OF AIR MANAGEMENT**

**Springs Valley Manufacturing  
8831 West State Road 56  
West Baden Springs, Indiana 47469**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Permit Modification No.: 117-12544-00004	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary wood furniture products manufacturing operation.

Responsible Official: Chris Thyen, Vice President  
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469  
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469  
Telephone Number: 812-634-3702 (contact: Gayle Pahmeier)  
SIC Code: 2511, 2521, 2434, 2517  
County Location: Orange  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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Springs Valley Manufacturing is a stationary source. The following emission units and pollution control devices are included in this permit modification:

Wood coating spray booths and dip tanks, including:

- (1) Thirty-six (36) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters for particulate matter control;
- (2) One (1) coating dip tank, identified as station 33;
- (3) One (1) Automated Flat Line Finishing System, identified as SB-38;

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21), have also been taken into consideration in limiting the total source VOC potential to emit to less than 250 tons per year:

- (1) One (1) dip tank (DT-3) using water dye dip.
- (2) One (1) natural gas fired incinerator, with a design waste capacity of 300 lb/hour, equipped with primary and secondary burners, used for disposal of waste including but not limited to paint off of buckets, non-hazardous water-based adhesives, and other non-hazardous wastes. [326 IAC 4-2-2]

### A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONDITIONS**

### **B.1        Definitions [326 IAC 2-7-1]**

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Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.2        Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.3        Significant Permit Modification**

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- (a)        This Modification will be added to the proposed Title V permit, and the Title V permit will be issued after EPA review.
  
  - (b)        This is a Significant Permit Modification because it required a determination of new emission limit for the surface coating facilities, including the removal of prior PSD minor modification limits. These changes have already been subject to a thirty (30) day public notice period as part of the draft Title V permit for the source; no public comments were received. No additional public notice is required at this time.

### **B.4        Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a)        Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
  
  - (b)        Any application requesting an amendment or modification of this permit shall be submitted to:  
  
              Indiana Department of Environmental Management  
              Permits Branch, Office of Air Management  
              100 North Senate Avenue, P.O. Box 6015  
              Indianapolis, Indiana 46206-6015  
  
              Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
  
  - (c)        The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

## SECTION C

## GENERAL OPERATION CONDITIONS

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit VOC is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

### Compliance Requirements [326 IAC 2-1.1-11]

#### C.2 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### C.3 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

Records of all required data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### C.4 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) Unless otherwise specified in this approval, any report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]** The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Wood coating spray booths and dip tanks, including:

- (1) Thirty-six (36) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters for particulate matter control;
  - (2) One (1) coating dip tank, identified as station 33;
  - (3) One (1) Automated Flat Line Finishing System, identified as SB-38; and
- (Insignificant Activity) One (1) dip tank (DT-3) using water dye dip.

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Volatile organic compound (VOC) emissions from all of the surface coating facilities shall be limited to less than 246 tons per twelve consecutive month period.
- (b) This emission limit and the associated record keeping requirements limit the potential to emit (PTE) of VOC for the source to less than 250 tons per year. Compliance with these conditions makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

## Compliance Determination Requirements

### D.2 VOC Emission Determination [326 IAC 2-2] [40 CFR 52.21]

To document compliance with Condition D.1, the Permittee shall maintain complete and sufficient records as follows:

- (a) The amount and VOC content of each coating material and solvent used.
- (b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.
- (c) Compliance with Condition D.1 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

### D.3 VOC Limitation [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC limitation contained in Condition D.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1 and Condition D.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Conditions D.1 and D.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include:
    - (A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and
    - (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used.
  - (2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:
    - (A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.
    - (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.
  - (3) The weight of VOCs emitted for each compliance period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.5 Reporting Requirements: PSD Minor Limit**

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- (a) A quarterly summary of the information to document compliance with Condition D.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Records used to determine VOC emissions shall include the coating, thinner and clean up solvent usage, material safety data sheets (MSDS) and any additional information necessary to determine the VOC content, and the date of use. Records used to determine the VOC content of waste drummed and shipped offsite shall include the Hazardous Waste Reclamation Record sheets, or equivalent, with an entry for each addition to the waste collection drum, if the waste VOC is deducted from the reported VOC emissions.



- (c) A material safety data sheet (MSDS) and any additional information necessary to determine the VOC content for each coating and solvent shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

### **Conditions Replaced**

#### **D.6 Former Construction Permit and Operation Permit Conditions**

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The above conditions in this D section replace the following conditions from previous approvals:

- (a) OP 59-10-90-0051 and OP 59-10-90-0052, issued on March 9, 1987, as amended September 3, 1987, Amendment Conditions 1 and 2;
- (b) OP 59-10-90-0053 and OP 59-10-90-0054, issued on September 3, 1987, Conditions 4 and 5;
- (c) PC (59) 1806, issued on October 4, 1990, Operation Conditions 1, 2, and 3; and
- (d) CP 117-9836-00004, issued on August 18, 1998, Conditions D.1.1, D.1.10(a), and D.1.11(a).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Quarterly Report**

VOC Emissions - PSD Minor Limit

Source Name: Springs Valley Manufacturing  
A Division of Kimball International, Inc.  
Source Address: 8831 West State Road 56, West Baden Springs, IN 47469  
Mailing Address: 8831 West State Road 56, West Baden Springs, IN 47469  
Part 70 Permit No.: T117-7357-00004  
Facility: surface coating  
Parameter: VOC  
Limit: Less than 246 tons per year

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for a Permit Modification to Operating Permits and Construction Permits for a Part 70 Source

#### Source Background and Description

Source Name:	Springs Valley Manufacturing
Source Location:	8831 West State Road 56, West Baden Springs, IN 47469
County:	Orange
SIC Code:	2511, 2521, 2434, 2517
Part 70 Operation Permit No.:	T 117-7357-00004
Operation Permit Issuance Date:	not yet issued
Permit Modification No.:	117-12544-00004
Permit Reviewer:	Vickie Cordell

The Office of Air Management (OAM) has reviewed a permit modification application from Springs Valley Manufacturing relating to the operation of surface coating for wood furniture manufacturing. This is a Significant Permit Modification because it required a determination of new emission limit for the surface coating facilities, including the removal of prior PSD minor modification limits. These changes have already been subject to a thirty (30) day public notice period as part of the draft Title V permit for the source; no public comments were received. No additional public notice is required at this time.

#### Emission Units and Pollution Control Equipment

The following emission units and pollution control devices are included in this permit modification:

Wood coating spray booths and dip tanks, including:

- (a) Thirty-six (36) spray coating booths, identified as 1 through 32 and 34 through 37, using dry filters for particulate matter control;
- (b) One (1) coating dip tank, identified as station 33;
- (c) One (1) Automated Flat Line Finishing System, identified as SB-38.

**NOTE:** This listing includes a correction to the number of spray booths. The application for the first operation permit issued in 1982 listed eighteen (18) booths. An operation permit issued in 1987 listed only fourteen booths, although later review determined that coating usage rates were consistent with the rates for 18 booths. All subsequent booths and the dip tank were identified beginning with number 15. The four booths are now identified as 34 through 37, to avoid additional confusion which would be caused by renumbering facilities permitted since 1982.

#### Insignificant Activities

The following insignificant activities, as defined in 326 IAC 2-7-1(21), have also been taken into consideration in limiting the total source VOC potential to emit to less than 250 tons per year:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Combustion source flame safety purging on startup.

- (c) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (d) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (e) Other activities or categories not previously identified with potential, uncontrolled emissions equal to or less than thresholds require listing only. Pb 0.6 ton per year or 3.29 pounds per day, SO<sub>2</sub> 5 pounds per hour or 25 pounds per day. NO<sub>x</sub> 5 pounds per hour or 25 pounds per day, CO 25 pounds per day, PM 5 pounds per hour or 25 pounds per day, VOC 3 pounds per hour or 15 pounds per day:
  - (1) One (1) dip tank (DT-3) using water dye dip;
  - (2) One (1) natural gas fired incinerator, with a design waste capacity of 300 lb/hour, equipped with primary and secondary burners, used for disposal of waste including but not limited to paint off of buckets, non-hazardous water-based adhesives, and other non-hazardous wastes. [326 IAC 4-2-2]

### Existing Approvals

The source applied for a Part 70 Operating Permit on December 4, 1996; the Title V permit has not been issued yet. The source has been operating under previous approvals including, but not limited to, the following:

Operation Permits 59-10-90-0051 and 59-10-90-0052, issued March 9, 1987, and 59-10-90-0053 and 59-10-90-0054, issued September 3, 1987;

Amendment to Operation Permits 59-10-90-0051 and 59-10-90-0052, issued September 3, 1987, and Amendment A-117-6320-00004 (name change only), issued August 26, 1996;

Construction Permits PC (59)1806, issued October 4, 1990, and CP-117-9836-00004, issued August 18, 1998;

Registration CP 117-2523, issued June 18, 1992;

Permit by Rule: Incinerator Notification, received April 14, 1989.

**Note:** Most of these permits were issued under the source's former name, Kimball Piano Division.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the Title V application and additional information submitted by the applicant.

The Title V application for the source was received on December 4, 1996. An application requesting separate processing of the VOC limit was received on July 3, 2000.

## Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.” The Potential Emissions for the entire source are shown.

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Ethyl Benzene	less than 10
Formaldehyde	less than 10
Glycol Ether	less than 10
Methyl Alcohol	less than 10
Methyl Ethyl Ketone	less than 10
Methyl Isobutyl Ketone	less than 10
Methylene Chloride	less than 10
Toluene	greater than 10
Xylene	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	6
PM-10	0.2
SO <sub>2</sub>	not reported
VOC	115
CO	not reported
NO <sub>x</sub>	not reported
HAPs	22

A summary of historical Emission Inventory data is included as Appendix A of this TSD. The source has not actually emitted at major source levels and may elect to take a source wide limit to be a minor source pursuant to PSD.

### Limited Potential to Emit / Source Status

Proposed Source PSD and Part 70 Definition (PM and PM-10 shown are the PTE for the source, after controls for the surface coating and wood working; the HAPs total is the uncontrolled PTE; and the VOC is as limited):

	Limited Potential to Emit (tons/year)			
Process/facility	PM	PM-10	VOC	HAPs
all existing surface coating			246.0	
wood working operations			0.0	
insignificant activities, including natural gas combustion *			3.0	
Total Emissions	< 250	< 250	249	> 25

\* The individual natural gas combustion units are not considered significant emission units pursuant to Title V. However, the VOC emissions from insignificant activities were taken into consideration in establishing the source-wide 249 tons/year VOC limit and the resulting 246 tons/year surface coating VOC limit.

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) The VOC emissions were based on a source-wide VOC limit of 249 tons per year.

### County Attainment Status

The source is located in Orange County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Orange County has been designated as attainment or unclassifiable for ozone.
- (b) Orange County has been designated as attainment or unclassifiable for all other criteria pollutants.

## **Modification**

### **Conditions Replaced**

The following conditions from previous approvals are being replaced by the new PSD minor limit requirements and accompanying record keeping and reporting conditions:

- (a) OP 59-10-90-0051 and OP 59-10-90-0052, issued on March 9, 1987, as amended September 3, 1987:

Amendment Conditions 1 and 2, as follows:

- 1. ~~That volatile organic compound emissions from booth Nos. 1-22 shall be limited to 20.5 tons per month (246 tons per twelve consecutive month period).~~
- 2. ~~That a log of information necessary to document compliance with Condition #1 shall be maintained. These records shall be kept for at least the past twenty-four (24) month period and made available upon request of the Office of Air Management. A quarterly summary shall be submitted to the Office of Air Management by the end of the month following the quarter being reported to the following address:~~

Plan Review and Permit Section  
Office of Air Management  
Indiana Department of Environmental Management  
105 South Meridian Street  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Reason for replacement: This VOC limit was added to the permit to keep the existing source from exceeding the 250 tons per year Prevention of Significant Deterioration (PSD) major source level. The source is now taking a 249 tons per year source-wide VOC limit.

- (b) OP 59-10-90-0053 and OP 59-10-90-0054, issued on September 3, 1987:

Conditions 4 and 5, as follows:

- 4. ~~That volatile organic compound emissions from booth Nos. 23-32 shall be limited to 20.5 tons per month (246 tons per twelve consecutive month period).~~
- 5. ~~That a log of information necessary to document compliance with Condition No. 4 shall be maintained. This data shall include gallons of coating use, solvent density and solvent content, as percent by weight. These records shall be kept for at least the past twenty-four (24) month period and made available upon request of the Office of Air Management by the end of the month following the quarter being reported. It shall be sent to the following address:~~

~~Plan Review and Permit Section -- No. 3~~  
~~Office of Air Management~~  
~~Indiana Department of Environmental Management~~  
~~105 South Meridian Street~~  
~~P.O. Box 6015~~  
~~Indianapolis, Indiana 46206-6015~~

Reason for replacement: This VOC limit was added to the permit to make it a minor modification to a minor source pursuant to PSD. The source is now taking a 249 tons per year source-wide VOC limit.

- (c) PC (59) 1806, issued on October 4, 1990:

Operation Conditions 1, 2, and 3, as follows:

- ~~1. That volatile organic compound emissions shall be limited to 60.2 pounds per gallon on coating excluding water pursuant to 326 IAC 8-1-6 averaged over twenty-four hour period.~~
- ~~2. That hours of operation of the dip tank shall be limited to 2,160 hours per year.~~
- ~~3. That a log of information necessary to document compliance with condition No. 1 and 2 be maintained. This data shall include the quantity of coating usage, density, organic solvent content, as percent VOC by weight and actual hours of operation on a monthly basis. These records shall be kept for at least the past twenty-four (24) month period and be made available upon request of the Office of Air Management.~~

Reasons for replacement:

1. These conditions were apparently intended as Best Available Control Technology (BACT); no BACT analysis was actually done. However, the use of a dip tank rather than a spray booth has generally been accepted as BACT for this type of operation because of the maximum transfer efficiency.
2. The 60.2 pounds per gallon VOC limit in Condition 1 is invalid; it is impossible to have a VOC content that high. This was probably a typographical error.
3. Hours of operation can be difficult to verify and are not alone a good indication of the emissions from a process.
4. The intent of the BACT requirement is to reduce VOC emissions as much as possible in a way that is environmentally sound and economically feasible for the source. In this case, that intent is met by the use of a dip tank for coating application, and by restricting the overall VOC emissions. This facility is now included in the 249 tons per year source-wide VOC limit.

- (d) CP 117-9836-00004, issued on August 18, 1998:

Conditions D.1.1, D.1.10(a), and D.1.11(a), as follows:

- ~~D.1.1 Volatile Organic Compounds (VOC) Usage Limit [326 IAC 2-1-5]~~  
~~The VOC usage for the Automated Flat Line Finishing System shall not exceed 39 tons per twelve (12) consecutive month period rolled on a monthly basis. This is equivalent to potential to emit VOC of 39 tons per year. Compliance with this limit shall render 326 IAC 2-2 (PSD Rules) not applicable.~~



~~D.1.10 Record Keeping Requirements~~

- ~~(a) To document continuous compliance with condition D.1.1, the Permittee shall maintain records of monthly VOC usage.~~

~~D.1.11 Reporting Requirements~~

- ~~(a) Quarterly Report [326 IAC 2-1-5]  
A quarterly summary to document compliance with operation condition D.1.1 shall be submitted within thirty (30) days after the end of the quarter being reported, using the enclosed form or its substantial equivalent. This shall include the monthly VOC usage and the VOC usage of the Automated Flat Line Finishing System for the previous 12 months, for each month in a quarter.~~
- ~~(d) The report required in (a) of this condition shall be submitted to:~~

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Reason for replacement: This VOC limit was added to the permit to make it a minor modification to a major source pursuant to PSD. The source is now taking a 249 tons per year source-wide VOC limit to be a minor PSD source, including this equipment.

**New Permit Conditions**

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

- (a) Volatile organic compound (VOC) emissions from all of the surface coating facilities shall be limited to less than 246 tons per twelve consecutive month period.
- (b) This emission limit and the associated record keeping requirements limit the potential to emit (PTE) of VOC for the source to less than 250 tons per year. Compliance with these conditions makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

**Compliance Determination Requirements**

**D.2 VOC Emission Determination [326 IAC 2-2] [40 CFR 52.21]**

To document compliance with Condition D.1, the Permittee shall maintain complete and sufficient records as follows:

- (a) The amount and VOC content of each coating material and solvent used.
- (b) The total VOC emissions for each month. VOC emissions for each month shall be determined through a mass balance calculation whereby VOC emissions equal the sum of VOC inventory at the beginning of the month plus any VOC received onsite during the month, minus the sum of VOC remaining in inventory at the end of the month and any unused VOC transferred offsite during the month. The VOC content of waste shipped offsite for disposal may also be deducted in calculating the total VOC emissions, if desired.
- (c) Compliance with Condition D.1 shall be demonstrated within thirty (30) days of the end of each month based on the total calculated VOC emissions for the most recent twelve (12) month period.

**D.3 VOC Limitation [326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC limitation contained in Condition D.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1 and Condition D.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be complete and sufficient to establish compliance with the VOC emission limit and VOC emission determination requirements established in Conditions D.1 and D.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include:
- (A) Purchase orders, invoices, and any other tracking records necessary to verify the amount of each product received onsite and any shipped offsite, and the amount of each product dispensed from inventory to the coating area and any returned to inventory from the coating area, and
- (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material used.
- (2) The amount of VOC drummed and shipped offsite each month for disposal as waste, if the waste VOC is deducted from the total reported VOC usage. Records shall include:
- (A) The amount and VOC content of each used coating material and solvent collected for disposal offsite. Records shall include Hazardous Waste Reclamation Record sheets, or equivalent, with an entry made each time additional material is placed in a waste collection drum. Each entry shall note the complete product name or product number of the material and the quantity of material placed in the drum.
- (B) Material safety data sheets (MSDS) or other product information sheets necessary to verify the VOC content of each material placed in the drum.
- (3) The weight of VOCs emitted for each compliance period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.5 Reporting Requirements: PSD Minor Limit**

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- (a) A quarterly summary of the information to document compliance with Condition D.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) Records used to determine VOC emissions shall include the coating, thinner and clean up solvent usage, material safety data sheets (MSDS) and any additional information necessary to determine the VOC content, and the date of use. Records used to determine the VOC content of waste drummed and shipped offsite shall include the Hazardous Waste Reclamation Record sheets, or equivalent, with an entry for each addition to the waste collection drum, if the waste VOC is deducted from the reported VOC emissions.
- (c) A material safety data sheet (MSDS) and any additional information necessary to determine the VOC content for each coating and solvent shall be available for inspection at the facility, and the most accurate information available shall be used in determining VOC usage.

### **Conditions Replaced**

#### **D.6 Former Construction Permit and Operation Permit Conditions**

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The above conditions in this D section replace the following conditions from previous approvals:

- (a) OP 59-10-90-0051 and OP 59-10-90-0052, issued on March 9, 1987, as amended September 3, 1987, Amendment Conditions 1 and 2;
- (b) OP 59-10-90-0053 and OP 59-10-90-0054, issued on September 3, 1987, Conditions 4 and 5;
- (c) PC (59) 1806, issued on October 4, 1990, Operation Conditions 1, 2, and 3; and
- (d) CP 117-9836-00004, issued on August 18, 1998, Conditions D.1.1, D.1.10(a), and D.1.11(a).

### **Conclusion**

The wood furniture surface coating operations shall be subject to the conditions of the attached proposed Permit Modification No. 117-12544-00004.

## Appendix A: VOC Emission Summary

**Annual Source Emissions**

SPRINGS VALLEY MANUFACTURING

Plant ID: 117-00004

**Address:** HIGHWAY 56 ON THE BOULEVARD  
WEST BADEN, IN 47469

**UTM Easting:** 0.00 **UTM Northing:** 0.00

**NAICS:****Description:****Reported Potential Emissions**

Year	CO	NO2	PB	PM10	SO2	VOC
1999				0		221
1998				0		221

**Reported Actual Emissions**

Year	CO	NO2	PB	PM10	SO2	VOC
1999				0		115
1998				0		91
1997				0		91
1996				0		124
1995				0		166
1994				0		166
1993						226
1990	0	1		0	0	177